

**FILED**  
**FEBRUARY 25, 2008**

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Ieshia Brown

*Plaintiff,*

-vs-

City of Chicago and Chicago Po-  
lice Officers Roland, #8770,  
Chan, #18781 and Harrold,  
#16962

*Defendants.*

(*jury demand*)

**08 C 1126**

**JUDGE MANNING  
MAGISTRATE JUDGE COLE**

**COMPLAINT**

Plaintiff, by counsel, alleges as follows:

1. This is a civil action arising under 42 U.S.C. Section 1983.
2. The jurisdiction of this court is conferred by 28 U.S.C. Section 1343 and 28 U.S.C. Section 1367.
3. Plaintiff Ieshia Brown is a resident of the Northern District of Illinois.
4. Defendant City of Chicago is an Illinois municipal corporation; plaintiff seeks to impose liability on the City pursuant to 745 ILCS 10/9-102 as well as liability under 42 U.S.C. Section 1983.
5. Defendants Roland, #8770, Chan, #18781 and Harrold, #16962 were at all times relevant acting under color of their authority as Chicago police officers; each is sued in his individual capacity.

6. On or about February 24, 2006, one or more of defendants Roland, Chan and Harrold arrested plaintiff. Plaintiff does not raise any claim in this action about the lawfulness of the arrest.

7. In the course of making the above referred arrest, one or more of defendants Roland, Chan, and Harrold used excessive and unreasonable force, causing plaintiff to sustain personal injuries.

8. After plaintiff had been arrested, and pursuant to a municipal policy or practice, plaintiff was held in custody for an unreasonable length of time while officers sought to gather evidence against her.

9. As the direct and proximate result of the above described acts, plaintiff was deprived of rights secured by the Fourth and Fourteenth amendments to the Constitution of the United States.

10. Plaintiff hereby demands trial by jury.

Wherefore plaintiff requests that judgment be entered in her favor and against defendants in an amount in excess of twenty-five thousand dollars as compensatory damages.

/s/ Kenneth N. Flaxman  
Kenneth N. Flaxman  
ARDC No. 0830399  
200 S Michigan Ave, Ste 1240  
Chicago, IL 60604  
(312) 427-3200  
knf@kenlaw.com  
*attorney for plaintiff*